

H. Blickenstaff and Matilda V. Blickenstaff, his wife, were possessed of a good and merchantable title at the time of their straw conveyance to the said William C. Main and Myrtle Main, his wife.

NINTH: That on August 7, 1962, a decree was passed removing the cloud on that property, and your Orators herein pray that this decree as well as the certified copies of the deeds depicting the chain of title of that suit be incorporated by reference in the instant case.

TENTH: That your Orators believe and therefore aver that the infirmities of title in the case referred to are the same as those existing the instant case as both parcels of land were derived from the same tract of land; that, although cloud on the title to the property belonging to Alva F. Rice and Mattie M. Rice was cleared by the aforementioned decree, your Orators believe and therefore aver that there still exists a cloud upon the title to their property and that the same cannot be established of record; that your Orators have no adequate remedy at law.

TO THE END, THEREFORE:

1. That your Honorable Court may take jurisdiction in the premises and enter a Decree quieting title to the real estate mentioned and described in this Bill of Complaint and remove the cloud from the title thereof.

2. That this Court shall declare that your Orators have a good and marketable fee simple title to the property mentioned in the Bill of Complaint and may sell or convey or otherwise deal with such property without regard to the claims of the unknown heirs, devisees, personal representatives, descendants or successors, of Jacob Hummer, deceased.

3. That this Court shall pass an Order of Publication according to law, requiring the unknown heirs, devisees, personal representatives, descendants or successors of Jacob Hummer, to be and appear in this Court on some certain day to be named in said Order, to answer the premises and abide by and perform such decree as may be passed therein.

4. That your Orators may have such other and further relief as the nature of their case may require.

And as in duty bound, etc.

Rosenstock & McSherry

by

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